PB90-183047

Superfund Program Evaluation Handbook for Fiscal Year 1987

(U.S.) Environmental Protection Agency, Washington, DC

Nov 86

U.S. Department of Commerce
National Technical Information Service

United States
Environmental Protection
Agency

Office of Emergency and
Remedial Response
Washington DC 20460

OSWER Directive 9355.3-2
December 1989

Superfund

PB90-183047

EPA

Superfund Program Evaluation Handbook

Fiscal Year 1987

Final

REPRODUCED BY
U.S. DEPARTMENT OF COMMERCE
NATIONAL TECHNICAL INFORMATION SERVICE
SPRINGFIELD, VA. 22161

REPORT DOCUMENTATION PAGE

Form Approved
OMB No. 0704-0188

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0188), Washington, DC 20503.

1. AGENCY USE ONLY (Leave blank)	2. REPORT DATE	3. REPORT TYPE AND DATES COVERED
PB 90 183047/AS	Nov. 1986	OSWER Directive

4. TITLE AND SUBTITLE

Superfund Program Evaluation Handbook
Fiscal Year 1987

5. FUNDING NUMBERS

6. AUTHOR(S)

7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES)

Office of Emergency & Remedial Response
Emergency Response Division

8. PERFORMING ORGANIZATION REPORT NUMBER

9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)

U.S. Environmental Protection Agency
Office of Solid Waste and Emergency Response
401 M Street SW
Washington, DC 20460

10. SPONSORING/MONITORING AGENCY REPORT NUMBER

11. SUPPLEMENTARY NOTES

12a. DISTRIBUTION/AVAILABILITY STATEMENT

This document, after 1987, was superceded by and included in the "SCAP" - Superfund Comprehensive Accomplishment Plan."

12b. DISTRIBUTION CODE

13. ABSTRACT (Maximum 200 words)

The Superfund Evaluation Handbook offers a comprehensive framework for reviewing program peformance. It is designed to consolidate the program's current evaluation activities while opening new avenues of program dialogue.

14. SUBJECT TERMS

Superfund , CERCLA, program management, program planning, program evaluation, performance review, management by objectives, cleanup of sites, regional performance

15. NUMBER OF PAGES

53

16. PRICE CODE

17. SECURITY CLASSIFICATION OF REPORT	18. SECURITY CLASSIFICATION OF THIS PAGE	19. SECURITY CLASSIFICATION OF ABSTRACT	20. LIMITATION OF ABSTRACT
unclassified	unclassified	unclassified	unlimited

OSWER Directive 9200.2-2

SUPERFUND PROGRAM EVALUATION HANDBOOK

Fiscal Year 1987

Office of Solid Waste and Emergency Response
U.S. Environmental Protection Agency
Washington, DC 20460

CONTENTS

		Page
I.	OVERVIEW OF THE EVALUATION FRAMEWORK	1
	The Evaluation Framework and the Management Process	3
II.	THE EVALUATION MEASURES AND THEMES	4
	1. FY 87 Accountability Measures	5
	2. FY 87 Qualitative Themes	6
III.	THE EVALUATION PROCESS	6
	1. Quarterly Reporting	7
	a. Development of Accountability Measures	7
	b. Tracking and Assessment	8
	c. Follow-up Action	8
	2. Regional Self-Evaluation Reports	9
	3. Annual Regional Reviews	10
	4. Focused Studies	11
APPENDIX A.	FY 1987 ACCOUNTABILITY MEASURES	
APPENDIX B.	FY 1987 QUALITATIVE THEMES AND QUESTIONS	

I. OVERVIEW OF THE EVALUATION FRAMEWORK

The Superfund Evaluation Handbook offers a comprehensive framework for reviewing program performance. It is designed to consolidate the program's current evaluation activities while opening new avenues of program dialogue. Both Fund-financed and enforcement activities are included under this broad umbrella.

The evaluation process involves four basic tools:

† Quarterly reporting and assessment of accomplishments;

† Annual self-evaluation reports prepared by the Regions;

† Follow-up Regional review visits conducted by the Office of Solid Waste and Emergency Response (OSWER); and

† Focused studies on issues requiring further analysis.

For the most part, this structure is already in place. Only the Regional self-evaluation report is a completely new requirement.

The next page provides a summary of these core elements. It is followed by a diagram of the evaluation timeframe and a matrix showing the roles of key program offices.

Core Elements of the Evaluation Framework

Quarterly Reporting

Senior OSWER management review each Region's accomplishments against a set of accountability measures established at the beginning of the fiscal year. The accountability measures include all SPMS targets and most activities reported in the SCAP.

Regional Self-Evaluation Reports

Once a year, each Region prepares a written self-evaluation report addressing selected areas of key importance. These areas, or "qualitative themes," are specified in the Handbook published at the start of the FY. The report is reviewed at Headquarters prior to the Regional review visit, which examines any strengths or weaknesses that may be apparent.

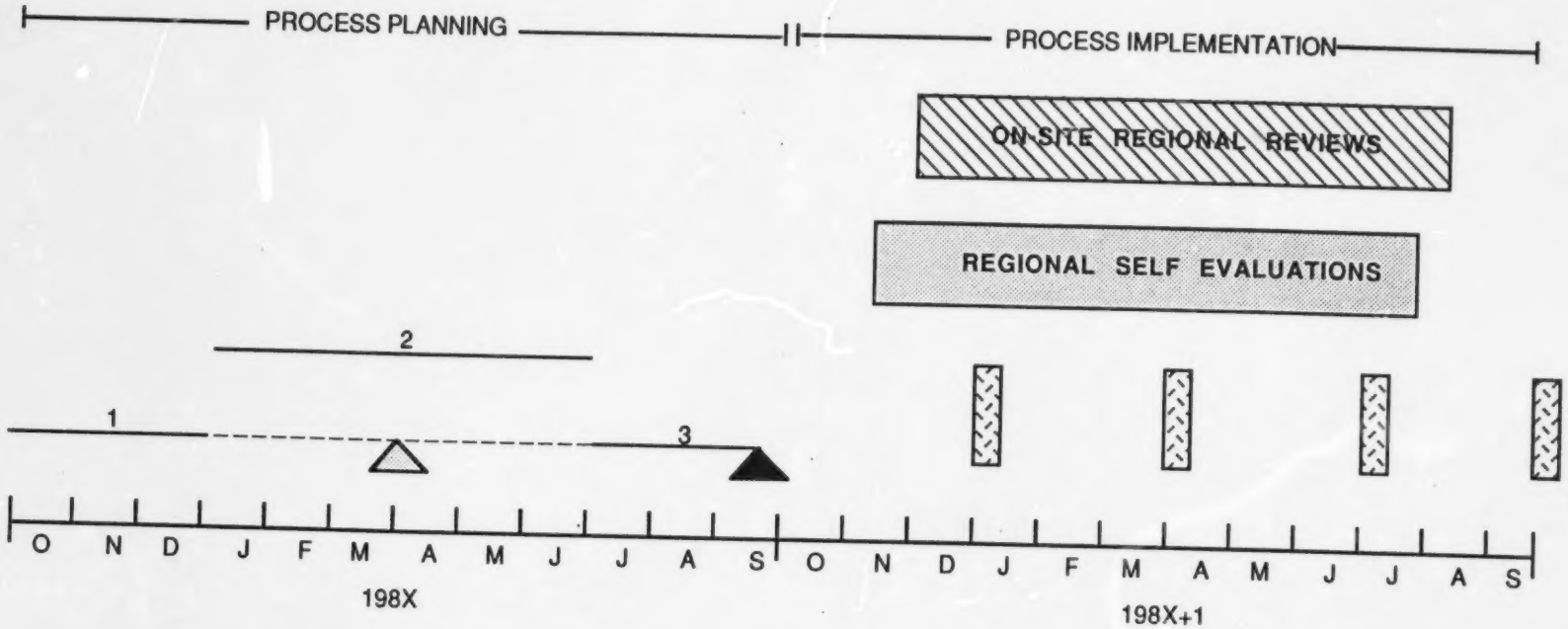
Regional Review Visits

The Office of Solid Waste and Emergency Response (OSWER) administers the annual Regional review visits that follow the self-evaluation. Each review includes a series of management-level meetings and discussions on subjects identified through the reports or by other means (separate sessions are held for the RCRA program). In the concluding senior management session, agreement is sought on further steps to be taken by HQ or the Region. File reviews may be performed to verify information supplied in the self-evaluation report.

Focused Studies

The program may initiate studies of broader scale on issues requiring extensive, in-depth analysis (e.g., the quality and timeliness of RI/FS). Focused studies may be an outgrowth of Regional review visits, quarterly data analysis, or any other interaction between Regions and HQ. Staff from a variety of Regional and HQ offices may be involved.

EVALUATION PROCESS TIMELINE



Draft Evaluation Handbook

Final Evaluation Handbook

Quarterly Reporting Process (Quantitative Measures)

1. Develop SCAP/accountability measures and performance expectations for upcoming FY
2. Negotiate and establish targets for SCAP/accountability measures
3. Complete revisions to targets, measures, and expectations.

2.a

ROLES AND RESPONSIBILITIES MATRIX

OSWER	• Coordinate quarterly review of program performance on accountability measures • Present significant findings and issues to the Administrator and/or Deputy Administrator • Administer annual Regional review process
OERR/OPM & OWPE	• Coordinate the development of accountability measures, self-evaluation themes and related questions • Assemble quarterly evaluation data from HQ program divisions and present findings to the Directors of OERR and OWPE, and the Assistant Administrator • Coordinate HQ review of Regional self-evaluations and HQ involvement in OSWER annual reviews • Monitor follow-up actions and focused studies
HQ PROGRAM DIVISIONS	• Collect and review quarterly evaluation data reported by Regions • Review and analyze Regional self-evaluations and participate in annual Regional reviews • Initiate or participate in follow-up actions and focused studies
REGIONS	• Provide quarterly evaluation data to Headquarters • Prepare annual self-evaluations and participate in annual Regional reviews • Provide input to the development of accountability measures, self-evaluation themes and related questions • Assist in follow-up actions and focused studies

The Evaluation Framework and the Management Process

In a broad context, evaluation may be viewed as one major component of the Superfund management and planning cycle. The management framework also includes the: (1) Agency Operating Guidance, which spells out the program's broad goals for the planning fiscal year; (2) program budget, which identifies resource needs for the program; (3) workload model, which allocates staff among the Regions; (4) Strategic Planning and Management System (SPMS), which records key accomplishments for the attention of the AA and Administrator; and (5) Superfund Comprehensive Accomplishments Plan (SCAP), which identifies site-specific actions needed to support the budget, workload model, SPMS and other program management decisions.

The planning process begins early in the operating fiscal year with development of the Operating Guidance, which highlights major policy and program initiatives and provides Regions and States with directions for carrying out environmental programs. The Guidance closely reflects the Administrator's management plan and the priorities of each Assistant Administrator.

These guidelines are refined as the program budget is developed. Budget preparation involves the efforts of Headquarters and Regional staff in revising cost estimates to reflect new program initiatives. In Superfund, a large part of the budget is based on site schedules contained in the SCAP.

From January through May, the Operating Guidance is revised, the budget adjusted to reflect Congressional action and other changes (such as new site schedules and cost estimates), and measures developed for the SPMS. During the same period, the SCAP is also revised to focus on site-specific resource needs and schedules for the planning fiscal year. The preliminary SCAP is used in allocating FTE's among the Regions and setting preliminary SPMS commitments.

As the new fiscal year approaches, the SCAP is again updated to reflect changes to site schedules and cost estimates. Final SPMS commitments are based on this revised document. During the year, the SCAP is updated quarterly to reflect actual accomplishments, anticipated emergency actions for the upcoming quarter, and schedule changes for long-term remedial work.

Evaluation measures are developed in parallel with those of the SCAP and SPMS. Beginning in January, SCAP and SPMS measures are revised to reflect the new Operating Guidance and budget. At the same time, the Handbook's accountability measures are assessed for consistency with the SCAP as work begins on a new set of qualitative themes. This task is completed in September so that HQ and Regions have a common understanding of their expected roles and accomplishments for the new fiscal year.

As the year unfolds, the evaluation framework is used to monitor program performance, guide management decisions on resource allocation, and identify needed program and policy initiatives. Conclusions are factored into the Operating Guidance, budget and SCAP planning for later fiscal years.

II. THE EVALUATION MEASURES AND THEMES

Program evaluation serves two distinct, but related, purposes: to measure specific outputs against established goals; and to assess the overall effectiveness of program operations. Accordingly, the Handbook contains:

- Accountability measures which establish performance expectations for key program activities, such as RI/FS starts, RA completions, and NPL sites with a completed PRP search;
- Qualitative themes which focus on program effectiveness in areas of policy implementation, program management, and cost and schedule control.

The accountability measures are carefully selected to give a balanced picture of the program. They include all SPMS measures, which are reviewed by senior Agency management, and some measures based on SCAP activities, which are monitored by OSWER. Each evaluation measure has a performance expectation based on the associated SPMS/SCAP target (e.g., 100% of planned RI/FS starts). If the program is to be successful, the Regions must have a strong record of accomplishment against these goals. Following each quarter, the Regional Administrator will receive an assessment of the Region's performance.

In some situations, evaluation targets may be missed for reasons that are difficult to control or foresee. The evaluation will take into account any circumstances that may have impeded performance. Thus, the failure to meet a particular target will not necessarily result in a negative assessment.

The qualitative themes provide a general framework for Regional/HQ dialogue on program analysis and improvement. They serve to focus the self-evaluation exercise and Regional reviews around a well-defined set of key program issues. As the themes are not output measures, they are not accompanied by quantified performance expectations.

1. FY 87 Accountability Measures

For FY 87, accountability measures have been developed in seven major program areas: Pre-Remedial, Remedial, Enforcement (Pre-Enforcement, Judicial Enforcement and Cost Recovery), Removal, Financial Management, Analytical Support, and Community Relations. Appendix A contains the full list of measures. Some examples appear below:

Measure	Performance Expectation
- Number of site inspections completed (Pre-Remedial #2)	100% of SCAP/ SPMS target
- Number of subsequent remedial design starts at NPL sites (Remedial #9)	100% of SCAP target
- Number of Fund-financed first removal starts at NPL sites (Removal #1a)	+/- 20% of Fund-financed SPMS subtarget
- NPL sites with completed PRP search (Enforcement #1)	100% of Final SCAP NPL Update target

For some key program activities (e.g., RI/FS starts), the Handbook incorporates the SPMS/SCAP combined measure for Fund-financed and PRP-financed activity. These measures may be accompanied by subtargets, established through SCAP, for Program (or Fund-financed), Enforcement, and PRP response, with a percentage range or "window" as the performance expectation. For example, while Regions are asked to achieve 100% of the combined target for RI/FS starts, they are only expected to come within + or - 20% of the Program-lead subtarget (also, there is an extra margin of one site for all "window" subtargets). This approach allows for lead shifts, such as "PRP takeovers," or site substitutions that are not anticipated when SCAP/SPMS commitments are set. Combined measures are subject to stricter accountability than are subtargets.

Quantitative measures are reviewed and updated annually to reflect changes in program direction, emphasis and commitments. This occurs in conjunction with established procedures for revising SCAP and SPMS measures.

2. FY 87 Qualitative Themes

The qualitative dimension of the review is based on the set of key themes and issues outlined in Appendix B. Taken together, the themes touch on most major components of the Superfund program.

FY 87 Qualitative Themes

- Implementing Superfund Reauthorization
- Conducting Pre-Enforcement Activity
- Negotiating PRP Settlements
- Determining Health-based Cleanup Approaches
- Selecting Permanent, Cost-Effective Solutions
- Improving PRP and Fund-financed Project Management
- Coordinating EPA/State Enforcement Efforts
- Delivering Analytic Services
- Improving Communication with the Public

In the written self-evaluation exercise, described in Section III, Regions are asked to assess their performance in these thematic areas. The Handbook specifies major points that should be addressed and provides detailed questions that Regions may wish to refer to in developing the discussion (Appendix B). However, Regions are not required to use the questions. Some of the questions are also used to guide discussions in the annual review.

Qualitative themes are updated each year. In the third quarter of the operating fiscal year, the Office of Emergency and Remedial Response (OERR) and the Office of Waste Programs Enforcement (OWPE) work together to develop draft questions for the following fiscal year. The draft is circulated among Regions and at HQ for review and comment. Assistance is provided by HQ program offices and the Management Advisory Committee (MAC) in defining program priorities and framing individual themes and questions. The MAC serves as a HQ/Regional advisory group in the areas of program management and planning, program evaluation, and information systems.

III. THE EVALUATION PROCESS

As discussed, the evaluation framework includes four main elements: quarterly reporting (on accountability measures), Regional self-evaluation reports (on qualitative themes), follow-up Regional review visits, and focused studies.

1. Quarterly Reporting

Program performance against accountability measures is assessed on a quarterly basis. At the close of each quarter, Regions supply accomplishment data to Headquarters through the SCAP updates. The information is then verified and interpreted by OERR and OWPE with input from the Regions. Follow-up communication, if needed, may involve informal discussions, written letters, or meetings.

The evalation process involves no new reporting requirements. Evaluation data are reported through the regular SCAP process, while accomplishment targets mirror fiscal year and quarterly SCAP commitments.

(a) Development of Accountability Measures

Evaluation measures are developed in parallel with the major phases of the planning cycle:

° During the first quarter of the operating fiscal year, HQ and Regions conduct preliminary discussions to identify potential changes to SCAP methodologies, items and definitions. This lays the groundwork for the development of accountability measures.

° In the second quarter, draft SCAP methodologies for the planning FY are reviewed at Headquarters and Regions. Included with the methodologies are definitions of all SCAP measures and tentative activity targets based on the preliminary SCAP. A draft set of evaluation measures is also forwarded for review.

° Regions and HQ negotiate final SCAP commitments in the early summer. This process also leads to final accountability measures reflecting the SCAP revisions.

° Evaluation measures are incorporated into the Handbook for publication by the beginning of October. The Superfund planning and evaluation cycle starts again in the new fiscal year.

Once the Handbook is issued, the evaluation measures remain in effect for the full fiscal year. In some cases, however, particular SCAP targets may be revised through the SCAP amendment process; for example, the RI/FS start target for a Region might be changed from 12 to 11. This would not change the Handbook's performance expectation; instead, the expectation would simply apply to the new target (e.g., 100% of the new RI/FS start target of 11).

(b) Tracking and Assessment

Until the consolidated CERCLIS becomes operational, Regions will continue to report quarterly accomplishments through the integrated SCAP, CERCLIS, Case Management System (CMS), and Remedial/Removal Financial Management System (RRFS). All SCAP data should be reported to HQ within four working days from the end of the quarter, as spelled out in the SCAP guidance. In a few cases, additional calculations are needed to convert the SCAP data to the needed form (e.g., for Remedial measures #5 or #6, the percentage of RI/FS completed on schedule will be derived from SCAP data on RI/FS completions and the completion date). Any extra steps are performed by Headquarters.

Within five weeks from the end of the quarter, OERR and OWPE assemble the reporting data supplied by the Regions and prepare a report for the respective program Directors. Highlighted in the report are significant accomplishments, patterns, or issues involving program performance. Before presenting the report, the divisions check the figures for completeness and accuracy, with assistance from the Regions. At this stage, Regions have full opportunity to provide any information they feel should be considered as the data is reviewed and interpreted. The findings are presented to the Assistant Administrator, OSWER, and a written summary of the data is provided to the Region.

These procedures will be streamlined when the planned changes to CERCLIS are put into effect. Implementation of the new system, scheduled for FY 87, will allow consolidated reporting and analysis of data for SCAP and SPMS. Most needed information will then be available from a single source that can be accessed by Regions and Headquarters. It is emphasized, however, that evaluation data can be obtained from present reporting arrangements as the unified system is developed.

(c) Follow-Up Action

After quarterly data have been reviewed, there may be follow-up communication on performance issues of interest or concern. Very often, this may be limited to informal discussions to verify data (if performance expectations are achieved, such action may be waived entirely). Program offices are responsible for initiating follow-up.

A more formal response is generally reserved for matters of serious disagreement or concern. Situations of this nature may occur if (1) a particular target is missed in successive quarters; (2) actual performance falls far below expectation; (3) a large number of targets are missed; or (4) there is a common pattern or problem affecting several Regions. Missing a particular target generally does not trigger this level of response except in one of the listed cases.

Follow-up action starts with a written request for information or clarification and an offer of assistance in resolving any outstanding issues. The communication emphasizes the need for a cooperative approach involving both HQ and Regions. Regions are invited to express their views freely and to identify actions needed from Headquarters, such as policy clarification.

Problems that are persistent or pervasive may be addressed through focused studies on specific topics or through other follow-up actions. The annual OSWER Regional visits, while focused on qualitative issues, may provide some opportunity for reviewing progress.

2. Regional Self-Evaluation Reports

Qualitative questions are best explored through the free exchange of information and opinion. This is achieved by means of a two-stage process that blends data presentation with open discussion.

- On an annual basis, each Region prepares a written self-evaluation report addressing major themes outlined in the Evaluation Handbook;
- After HQ review of the report, a follow-up visit is conducted through the OSWER annual review process to discuss any issues that may be evident.

The self-evaluation exercise allows Regions to present their own perspective on the program while preparing for the OSWER review. At the same time, the review team is able to examine these presentations in light of information available at HQ or requested from Regions. The review may also take up any issues remaining from the quarterly reporting process.

The evaluation cycle begins when the Handbook, containing the major program themes, is published at the start of the fiscal year. For each theme, Regions develop a written assessment of their performance, explaining significant actions, accomplishments, and problems. The response should be built around the specific qualitative issues related to the theme (Appendix B). For example:

Theme	Specific Issues
° Selecting permanent, cost-effective solutions	† Use of alternative treatment/ destruction technologies in remedial and removal response
	† Weighing cost and effectiveness in selecting a cleanup approach

This framework ensures that Regional reports will be reasonably consistent in format. Beyond these basic requirements, Regions may choose any response approach they consider useful and appropriate. In developing the response, Regions are free to use the optional guideline questions referenced in the list of themes/issues (Appendix B). These questions touch on specific points that may be useful in focusing the discussion. The self-evaluations should be succinct and well-focused; quality is a more important factor than length.

The Regional evaluation/review cycle generally begins in the first quarter of the fiscal year. Regions are reviewed sequentially over a period of seven months or more. This staggered timeframe allows all self-evaluation reports and follow-up reviews to be performed in a standard, two-stage sequence. In addition, any extra work involved in reviewing the self-evaluations is spread out evenly over the year.

To allow time for analysis, each Region submits the completed self-evaluation no later than six weeks before the scheduled date of the review visit. OSWER then reviews the report and develops a proposed agenda for the review, outlining the schedule for individual sessions and the specific topics to be addressed. These topics are based on the self-evaluation exercise, additional questions from Appendix B, issues specific to a particular Region, or the findings of recent or ongoing studies. However, the agenda will not cover every question appearing in the Handbook. The proposed agenda is finalized after agreement on format and scheduling.

If the self-evaluation appears inconsistent with other program data, OSWER may request that selected records and files be made available to the review team for data validation. File reviews are generally limited to matters of priority and are discussed in advance with Regional program managers. In most cases, the inspections are performed by staff-level personnel during the Regional review visits, or in the preceding week. Extensive data validation may require a separate visit prior to the main OSWER review.

3. Annual Regional Reviews

The OSWER Regional review consists of a 3- to 4-day series of management-level discussions on key issues in the Superfund and RCRA programs. After an introductory briefing, concurrent breakout sessions are held on individual program or policy areas, such as the delivery of analytic services or judicial enforcement. The visit concludes with a senior management session, and a report of the findings is drafted on location.

The basic structure of the OSWER review is not changed by any requirement laid out in the Evaluation Handbook. As in previous years, the written agenda serves as the protocol for the review. Program offices have primary responsibility for selecting review team members and work with OSWER on developing schedules and other logistical arrangements.

In the senior management session, agreement is sought on follow-up actions to be performed by Regions and/or HQ, such as the institution of management controls, expedited preparation of required documents, or development or clarification of policy. The agreement is spelled out in a memorandum signed by the Directors of OERR and OWPE and the appropriate Regional official within 30 days after the concluding session. Responsibility for monitoring the assignments is shared by OERR and OWPE. These offices may also help to syntehsize and interpret findings from the reviews.

4. Focused Studies

Some issues may need to be explored in greater depth following the annual review. To meet this need, the program may initiate studies of varied scope and complexity that focus on identified concerns. The project concepts may stem from the OSWER Regional reviews, quarterly reporting data, OERR/OWPE initiatives, or the FMFIA exercise. For illustration, some FY 86 studies examined:

- Procedures for ensuring the quality of RI/FS;
- Quality control for pre-remedial steps;
- Resource requirements for the CERCLA Enforcement Program.

Depending on its purpose, the focused study may involve staff from OSWER, HQ or Regional offices, special task forces or workgroups, or other Agency offices. Responsibility for coordination, monitoring, and synthesis may be shared by the lead program office, management support offices, or other units.

APPENDIX A

FY 1987 Accountability Measures

* * * * *

Accountability measures are defined in the FY 1987 SCAP Methodologies and the listing of SPMS measures and commitments issued by the Office of Policy, Planning, and Evaluation.

* * * * *

PRE-REMEDIAL ACTIVITY

OBJECTIVE: Complete identification, assessment and scoring of hazardous waste sites in a timely manner.

PERFORMANCE MEASURE	TARGET CURRENTLY IN		PERFORMANCE EXPECTATION
	SCAP	SPMS	
1. Number of preliminary assessments (PAs) completed	Yes	Yes	100% of SCAP/ SPMS target
2. Number of site inspections (SIs) completed	Yes	Yes	100% of SCAP/ SPMS target
3. Number of expanded site inspections completed	Yes	No	100% of SCAP target

REMEDIAL PROGRAM

OBJECTIVE: Develop and implement effective cleanup approaches at uncontrolled hazardous waste sites that threaten human health or the environment

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
* 1. Number of first RI/FS starts (Fund-financed + PRP + Federal facilities)	Yes	Yes	100% of combined SPMS target
a. Number of program-lead first RI/FS starts at NPL sites	Yes	No	± 20% of program-lead RI/FS target in final SCAP
b. Number of enforcement-lead first RI/FS starts at NPL sites	Yes	No	100% of enforcement-lead RI/FS target in final SCAP ± any lead shifts or substitutions
c. Number of PRP-lead first RI/FS starts at NPL sites	Yes	No	100% of PRP-lead RI/FS target in final SCAP ± any lead shifts or substitutions
2. Number of subsequent RI/FS starts at NPL sites	Yes	Yes	100% of SCAP/SPMS target
3. Number of first RI/FS completions at NPL sites (ROD/EDD)	Yes	Yes	100% of SCAP/SPMS target

* Combined targets are subject to stricter accountability than are subtargets for program, enforcement or PRP response.

REMEDIAL PROGRAM

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
4. Number of subsequent RI/FS completions at NPL sites	Yes	Yes	100% of SCAP/SPMS target
† 5. Percent of RI/FS completed in the planned completion quarter	No	No	100% of planned RI/FS completions identified in the final SCAP
† 6. Percent of RI/FS completed within one quarter of planned completion quarter	No	No	100% of planned RI/FS completions identified in the preliminary SCAP
7. Number of expedited response actions (ERAs) completed	Yes	No	100% of SCAP target
* 8. Number of first RD starts at NPL sites	Yes	No	100% of SCAP target
a. Number of Fund-financed first RD starts at NPL sites	Yes	No	± 20% of Fund-financed first RD start target in final SCAP
b. Number of PRP-financed first RD starts at NPL sites	Yes	No	100% of PRP-financed first RD start target in final SCAP ± any lead shifts or substitutions

† Accomplishments are evaluated against both the final SCAP (#5) and the preliminary SCAP (#6). The latter is the basis for FTE allocation.

* Combined targets are subject to stricter accountability than are subtargets for Fund or PRP response.

REMEDIAL PROGRAM

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
9. Number of subsequent RD starts at NPL sites	Yes	No	100% of SCAP target
10. Number of remedial designs completed at NPL sites	Yes	No	100% of SCAP target
† 11. Percent of RDs completed in the planned completion quarter	No	No	100% of planned RD completions identified in final SCAP
† 12. Percent of RDs completed within one quarter of the planned completion quarter	No	No	100% of planned RD completions identified in the preliminary SCAP
* 13. Number of first remedial action starts at NPL sites	Yes	Yes	100% of SCAP/SPMS target
a. Number of Fund-financed first RA starts at NPL sites	Yes	No	± 20% of SCAP target for Fund-financed first RA
b. Number of PRP-Financed first RA starts at NPL sites	Yes	No	100% of SCAP target for PRP-Financed first RA starts

† Accomplishments are evaluated against both the final SCAP (#5) and the preliminary SCAP (#6). The latter is the basis for FTE allocation.

* Combined targets are subject to stricter accountability than are subtargets for Fund or PRP response.

REMEDIAL PROGRAM

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
14. Number of subsequent remedial actions started at NPL sites.	Yes	Yes	100% of SCAP/SPMS target
15. Number of remedial actions completed at NPL sites.	Yes	Yes	100% of SCAP/SPMS target
† 16. Percent of RAs completed in the planned completion quarter	No	No	100% of planned RA completions identified in final SCAP
† 17. Percent of RAs completed within one quarter of the planned completion quarter	No	No	100% of planned RA completions identified in the preliminary SCAP
18. Number of sites where all remedial implementation has been completed.	No	Yes	100% of SPMS target
19. Number of sites where the NPL deletion process has been initiated.	Yes	Yes	100% of SCAP/SPMS target

† Accomplishments are evaluated against both the final SCAP (#5) and the preliminary SCAP (#6). The latter is the basis for FTE allocation.

REMOVAL PROGRAM

OBJECTIVE: Provide appropriate Federal response to releases of hazardous substances or the threat of such releases.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
* 1. Number of first removal starts at NPL sites (Fund-financed + PRP)	Yes	Yes	100% of SPMS combined target
a. Number of Fund-financed first removal starts at NPL sites	Yes	No	± 20% of Fund-financed subtarget
b. Number of PRP-financed first removal starts at NPL sites	Yes	No	100% of PRP subtarget ± any lead shifts or substitutions
2. Number of removal restarts at NPL sites (Fund-financed + PRP)	Yes	Yes	100% of SPMS combined measure
* 3. Number of NPL sites stabilized through a removal action	Yes	Yes	100% of SPMS/ SCAP target
a. Number of NPL sites stabilized through a Fund-financed removal action	Yes	No	± 20% of Fund-financed subtarget
b. Number of NPL sites stabilized through a PRP-financed removal action	Yes	No	100% of PRP subtarget ± any lead shifts or substitutions

* Combined targets are subject to stricter accountability than are subtargets for Fund or PRP response.

REMOVAL PROGRAM

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
* 4. Number of first removal starts at non-NPL sites (Fund-financed + PRP)	Yes	No	At least 90% of SCAP measure
a. Number of Fund-financed first removal starts at non-NPL sites	Yes	No	± 20% of Fund-financed submeasure
b. Number of PRP-financed first removal starts at non-NPL sites	Yes	No	100% of PRP subtarget ± any lead shifts or substitutions
5. Number of removal restarts at non-NPL sites (Fund-financed + PRP)	Yes	No	At least 90% of SCAP measure
* 6. Number of completed removal actions at non-NPL sites (Fund-financed + PRP)	Yes	No	At least 90% of SCAP target
a. Number of Fund-financed removal completions at non-NPL sites	Yes	No	± 20% of Fund-financed subtarget
b. Number of PRP-financed removal completions at non-NPL sites	Yes	No	100% of PRP subtarget ± any lead shifts or substitutions

* Combined targets are subject to stricter accountability than are subtargets for Fund or PRP response.

REMOVAL PROGRAM

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
° 7. Number of sites where a removal investigation has been completed.	Yes	No	At least 90% of SCAP measure
° 8. Number of hazardous substance spill cleanups monitored on-scene (excluding oil spill cleanups performed with CWA §311 funds)	Yes	No	At least 90% of SCAP measure

° These measures allow the program's planning and budgeting assumptions to be assessed through the evaluation process. Headquarters and Regions share the responsibility for developing accurate projections.

OIL SPILL PROGRAM

OBJECTIVE: Provide appropriate federal response to oil spills under authority of the Clean Water Act, §311

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
° 1. Number of oil spill cleanups monitored on-scene.	Yes	No	At least 90% of SCAP measure
° 2. Number of oil spill cleanups completed by Region using CWA §311 funds.	Yes	No	At least 90% of SCAP measure
° 3. Number of SPCC inspections completed.	Yes	No	At least 90% of SCAP measure

° These measures allow the program's planning and budgeting assumptions to be assessed through the evaluation process. Headquarters and Regions share the responsibility for developing accurate projections.

ENFORCEMENT ACTIVITIES

OBJECTIVE: Achieve responsible party financed response or recover funds expended by the CERCLA Program at sites where responsible parties failed to conduct all needed response.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
Pre-Enforcement/Administrative			
1. NPL sites with completed PRP search	Yes	No	100% of final SCAP NPL Update target
2. Non-NPL sites with completed PRP search	Yes	No	100% of final SCAP first start removal target at Non-NPL sites
Judicial Enforcement			
1. §106, §107, §7003 Case Resolution/Trial	Yes	No	100% of final SCAP target
2. §106 RD/RA Referrals w/o settlements	Yes	No	100% of final SCAP target
Cost Recovery			
1. Removal Cost Recovery Cases >$500,000 referred to headquarters	Yes	Yes	100% of final SCAP target
2. Remedial Cost Recovery cases referred to headquarters	Yes	Yes	100% of final SCAP target

FINANCIAL MANAGEMENT

OBJECTIVE: Effectively manage the resources of the response program.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
1. Percent of Regional SCAP remedial plan obligated (YTD)	No	No	Obligation targets by end of quarter: 1st: at least 90% of 1st Quarter obligation target in final SCAP, ± any SCAP amendments approved through the quarter 2nd: at least 90% of cumulative 2nd Quarter obligation target in final SCAP, ± any SCAP amendments approved through the quarter 3rd: at least 90% of cumulative 3rd Quarter obligation target in final SCAP, ± any SCAP amendments approved through the quarter 4th: 100% of cumulative 4th Quarter obligation target in final SCAP, ± any SCAP amendments approved through 9/1/87

FINANCIAL MANAGEMENT

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
2. Percent of Regional removal SCAP plan obligated (YTD)	No	No	Obligation targets by end of quarter: 1st: at least 85% of 1st quarter obligation target in final SCAP, adjusted to exclude planned obligations for sites that shifted to RP response during 1st quarter 2nd: at least 85% of 2nd quarter obligation target in final SCAP, adjusted to exclude planned obligations for sites that shifted to RP response during 2nd quarter 3rd: at least 85% of 3rd quarter obligation target in final SCAP, adjusted to exclude planned obligations for sites that shifted to RP response during 3rd quarter 4th: at least 95% of 4th Quarter obligation target in final SCAP, adjusted to exclude planned obligations for sites that shifted to RP response during 4th quarter

FINANCIAL MANAGEMENT

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
3. Disbursement of Regional response obligations (intramural and extramural TFAY9A)	Yes	No	+20% of SCAP target

ANALYTICAL SUPPORT PROGRAM

OBJECTIVE: Maintain capacity, quality and timeliness of analytical support.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
1. Percent of projected samples requested by Region	Yes	No	Within +10% to -20% of SCAP target
2. Percent of booked samples shipped by the Region to lab	Yes	No	At least 85% of the SCAP target

COMMUNITY RELATIONS

OBJECTIVE: Enhance communication between Agency and public at cleanup sites and provide opportunity for public input.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
1. a. Number of remedial sites where a community relations plan was completed with first RI/FS start	Yes	No	100% of RI/FS start target in final SCAP
b. Number of remedial sites where a public comment period and responsiveness summary were completed with ROD/EDD signature	Yes	No	100% of RI/FS completion target in final SCAP
c. Number of remedial sites where a public comment period and responsiveness summary were completed with NPL deletion	Yes	No	100% of NPL deletion target in final SCAP

CHEMICAL EMERGENCY PREPAREDNESS PROGRAM

Objective: Strengthen Federal, State and local preparedness for responding to releases of oil and hazardous substances.

PERFORMANCE MEASURE	TARGET CURRENTLY IN SCAP	TARGET CURRENTLY IN SPMS	PERFORMANCE EXPECTATION
1. Number of localities assisted in conducting "Table-Top" and/or simulation exercises in priority and non-priority areas	Yes	Yes	100% of SPMS target

APPENDIX B

FY 1987 Qualitative Themes and Questions

REGIONAL SELF-EVALUATION FORMAT

Summary of Qualitative Themes

In the self-evaluation report, Regions are asked to provide a written assessment of their accomplishments and problems in the following thematic areas. Assessments should focus on the specific topics that appear below each heading. In addition, the discussion should point out any actions or assistance needed from Headquarters.

In developing the discussion, Regions may find it helpful to refer to the review questions referenced in parentheses. The questions appear by program area following this summary. Their use is optional.

Implementing Superfund Reauthorization

° Actions initiated or planned to address:

† Designation of state standards, RMCLs, and federal water quality criteria as potentially applicable or relevant and appropriate (Remedial questions #3-4)
† Administrative record requirements (Information Collection and Management question #4)
† Removal/remedial consistency (Removal question #5)
† State involvement issues (Remedial questions #47-50)
† Implementation of Chemical Emergency Preparedness Program (CEPP questions #1-4)
† Health assessment requirements (Remedial questions #19-20)
† Hiring and training needs under reauthorized program (Management of Human Resources questions #1-4)

Note: Consideration of permanent remedies and alternative technologies is addressed under a separate theme.

Conducting Pre-Enforcement Activity
(Pre-Enforcement and Negotiations questions #1-6)

° Procedures for identifying PRPs before initial enforcement action

° How information on site conditions is collected

° How scope of needed response activity is defined in communications with PRP

° Procedures for informing PRPs of their potential liability and evaluating PRP response to notice letters

Negotiating PRP Settlements
(Pre-Enforcement and Negotiations questions #7-12)

- Factors causing negotiation delays
- Use of deadlines to bring negotiations to conclusion
- Level of detail sought in PRP settlements

Determining Health-based Cleanup Approaches

- How site-specific cleanup goals are set for soil and groundwater (Remedial questions #5-7)
- Achievement of applicable or relevant and appropriate requirements at response actions (Remedial questions #1-2, Removal question #10)
- Use of environmental models and field data in assessing human exposure to site-related contamination (Remedial questions #8, 18)
- How indicator chemicals and toxicity values are obtained (Remedial questions #16-17)

Selecting Permanent, Cost-Effective Solutions

- Use of alternative treatment/destruction technologies in remedial and removal response (Remedial questions #10-12, Removal questions #7-8)
- Weighing cost and effectiveness in selecting a cleanup approach (Remedial questions #14-15)

Improving PRP and Fund-financed Project Management

- Expediting the RI/FS process (Remedial questions #27-28, Analytical Support questions #1-4)
- Procedures for ensuring that PRP response conforms with cleanup standards
- Cost control for remedial and removal response (Remedial questions #35-38, Removal questions #19-20)
- Systems for tracking PRP response (Remedial question #51)
- Management of cooperative agreements (Remedial questions #40-42)

Coordinating EPA/State Enforcement Efforts (Remedial questions #43-46)

- How enforcement responsibility is shared between Regions and State enforcement agencies
- PRP tracking procedures under State settlements
- PRP compliance rate for State versus EPA settlements

Delivering Analytic Services (Analytical Support questions #1-8)

- Quality and timeliness of QA work performed by ESDs, ESAT or Waste Management Division
- Allocating analytical work among CLP contractors, ESAT, ESDs, and remedial/removal contractors
- Monitoring procedures for sample delivery and analysis and QA/QC

Improving Communication with the Public (Community Relations questions #1-4)

- Achieving coordination among community relations, enforcement and technical staff
- Public perceptions of community relations effort

QUALITATIVE REVIEW QUESTIONS

This section provides a listing of issues and questions that may be addressed in the FY 87 Regional reviews conducted by the Office of Solid Waste and Emergency Response. Before each review, the program will develop a written agenda that identifies the specific topics to be covered in that Region. These topics may be drawn from the Region's self-evaluation report, questions from this appendix, or other questions specific to individual Regions.

The questions may also be useful to the Region in developing the self-evaluation. Appropriate questions are referenced by number in the preceding list of self-evaluation themes.

Regions are not expected to address every question in the self-assessment or annual review. The questions are presented as discussion guides.

PRE-REMEDIAL

1. What are the Region's quality control procedures for PAs and SIs? Are they being strengthened?

   - FIT review of state-conducted PAs, SIs?
   - Review by Regional staff, including technical specialists (e.g., hydrogeologist)?
   - SI training for all reviewers?

2. What criteria are considered in making PA/SI decisions and priority rankings? In assigning priority to CERCLIS sites for PAs?

3. Is the Region performing thorough QC on HRS scores calculated by FIT, States and Regional staff? What proportion of HRS scores are substantially revised after MITRE QA? How could the accuracy of HRS scoring be improved?

4. What is being done to implement the Expanded SI concept? How are sites screened for ESI selection? How well does the preliminary HRS calculation predict the actual HRS score?

5. Do all SIs performed in the Region include analytical sampling? Is the sampling data included in site files?

6. How does the Region allocate FIT resources among response sites?

7. On average, how long does the Region take to initiate a preliminary assessment after receiving a PA petition from the public? Have all PAs resulting from petitions been completed within one year after initiation?

8. What proportion of petition PAs have led to site inspections? How does this compare to non-petition PAs? How often have petition PAs been conducted at sites previously recommended for no further action?

PRE-ENFORCEMENT ACTIVITY and NEGOTIATIONS

1. How is the accuracy and completeness of PRP search information assured?

2. What procedures exist for utilizing the enhanced administrative subpoena authority in the PRP search?

3. How are enforcement staff trained in PRP search techniques? Do some PRP search personnel have experience in investigations?

4. What criteria are used in site classification?

5. At enforcement-lead sites, how often has the RI/FS been initiated 18 months or more after the site is proposed for the NPL? What factors contributed to the delay?

6. How are information requests and PRP responses used to further the PRP search?

7. Describe the negotiation process for removal actions, RI/FS, and RD/RAs. What are the main factors affecting the length of negotiations, value of fixed negotiation timeframes, and level of detail provided in the settlement document?

8. How does the Region use unilateral orders? Discuss the choice of sites for unilateral orders and any negotiations that follow their issuance.

9. To what extent, and at what times, does the Regional Counsel become involved in negotiations?

10. What screening process is used to identify sites and PRPs for negotiation attempts?

11. How is the progress of negotiations assessed and monitored? How closely are regional managers involved in negotiations?

12. What training opportunities are available to staff involved in negotiations? How has staff turnover affected the negotiation process?

REMEDIAL PROGRAM

Remedy Selection

1. For RODs/EDDs prepared within the past year, how often is the selected remedy in compliance with applicable or relevant and appropriate requirements of the Safe Drinking Water Act, RCRA, and Clean Air Act?

2. In what situations, if any, has the Region invoked waivers provided in the NCP or the new waivers created under reauthorization (inconsistent application of State requirements, equivalent standard of performance)?

3. For RODs/EDDs prepared after the date of reauthorization, to what extent is the selected remedy in compliance with applicable or relevant and appropriate requirements (ARARs) of State law, RMCLs, and federal water quality criteria? To what extent have RI/FS in progress been modified to ensure attainment of new ARARs?

4. Has the Region determined whether any RODs/EDDs will need to be reopened to ensure that subsequent operable units are in compliance with new ARARs?

5. How has the Region determined soil cleanup goals at remedial sites? In what situations has the Region justified a cleanup goal above background through use of a site-specific risk assessment or a procedure equivalent to RCRA delisting? How often has cleanup to background been chosen?

6. In what situations have groundwater cleanup targets been tied to MCLs, ACLs, background levels, or a combination of other standards and criteria (e.g., HEAs, ADIs)? At what points will the groundwater be safe to drink? What enforceable measures or institutional controls have been imposed to prevent contamination beyond the compliance point?

7. At sites with groundwater contamination, has the Region developed a range of alternatives satisfying Agency policy on target risk levels for carcinogens? What risk levels are set for the "point of departure" alternative and other alternatives under consideration?

8. In developing ground water alternatives, does the Region use extensive field data to estimate the rate of restoration and extent of remediation for each approach? Are there significant data gaps or uncertainties that may reduce confidence in the estimates?

9. In what situations has the Region used the "To be considered" criteria, advisories and guidance listed in the Compliance Policy manual?

10. To what extent have selected remedies involved permanent treatment approaches that significantly reduce the toxicity, mobility and volume of hazardous waste? Have alternative treatment technologies been considered in every feasibility study? How often, and in what situations, have such approaches been selected?

11. What steps have been taken to encourage use of innovative techologies at remedial sites? What are the most significant barriers to their use: e.g., technology limitations, prohibitive cost, lack of capacity at facilities?

12. Has the Region collected data in the RI/FS to establish performance targets for alternatives involving permanent remedies? To what extent has pilot testing been conducted?

13. How is the Region addressing the findings of the FY86 study study that examined how alternative technologies had been considered in remedy selection?

14. How does the Region achieve balance between cost and effectiveness in selecting the remedial alternative? How are long-term O&M costs considered?

15. Where long-term O&M costs are significant, is a sensitivity analysis conducted that varies the discount rate? What other factors are considered in the sensitivity analysis? In what situations, if any, has the analysis affected the choice of a remedy?

16. In selecting indicator chemicals at remedial sites, does the Region screen all chemicals found at the site? What factors are considered in the screening?

17. For indicator chemicals without applicable or relevant and appropriate health-based standards, how does the Region obtain toxicity values for use in risk assessment -- e.g., by selecting ADIs, reference doses, TLVs, MEG values? In what situations is ORD consulted?

18. How does the Region decide whether to use modeling in exposure assessments? If modeling is used, how are particular models selected? Have any recommended models proven too complex for practical use? What could be done to facilitate appropriate use of these tools?

19. Has ATSDR completed a public health assessment for each ROD/EDD signed in the Region? Where this has not taken place, was ATSDR late in providing the assessment? Was field data provided to ATSDR on schedule?

20. What roles does ATSDR perform in the Region? Has the ATSDR provided comment on proposed remedies or issued recommendations on appropriate cleanup levels?

21. What steps have been taken to ensure that RCRA facility inspections are coordinated with anticipated CERCLA waste shipments?

22. How has the Off-Site Policy affected remedial actions? Have delays resulted from insufficient capacity at permitted or interim status facilities?

23. Does the Region ask RCRA personnel to review draft RODs on RCRA compliance issues?

Site Management Planning

24. For what purposes does the Region use SMPs: as general program milestones (for Regional Administrators), detailed project management goals (for RPMs), or both? How are SMPs used in SCAP development? Has remedial management benefited from their use?

25. How current are the Region's SMPs? How often are they updated? Is the process automated?

26. What role do States play in SMP development (e.g., initiating site plans)?

RI/FS Management

27. Has the Region initiated key elements of the "Phased RI/FS approach?"

    - Use of interim authorizations to expedite field work pending final approval of work plan

    - Creation of a Technical Advisory Committee to perform initial screening of remedial alternatives

    - Use of FS requirements in determining scope of RI and preparing more accurate work plan

    - Incorporation of DQOs in sampling plans and QAPPs

28. How long does the Region take to review work plans for RI/FS? What steps have been taken to expedite the process?

29. Does the Region issue formal work assignment amendments when the technical direction of the RI/FS undergoes change? Over the past year, how often have such amendments been issued, and for what reasons?

30. How does the Region monitor RI/FS deliverables and ensure reasonable quality? Does the RPM participate in regular project review meetings with contractors and/or States?

31. In developing site schedules for SMPs and the SCAP, how does the Region ensure that the program workload is is well balanced over the fiscal year? How are staffing needs and availability considered in establishing realistic schedules?

32. Has the Region fully implemented training and performance requirements for RPMs and supervisors?

33. To what extent has the Region used the REM contract award fee process? Have Regional award fee packages been submitted in complete form and in a timely manner?

34. Have Regions followed applicable guidance for preparing action memos for Expedited Response Actions?

Remedial Design and Action

35. During remedial design, does the Region participate in design reviews (preliminary, prefinal, and final) with contractor/State/COE to ensure consistency with environmental standards and the ROD?

36. For RDs currently underway or completed within the last two quarters, what is the incidence of major design changes involving a ROD amendment or a work interruption?

37. How does the Region oversee the progress of RAs and assess the adequacy of direct field inspections performed by the lead agency or party? How often have RA work assignments been amended, and why?

38. Has the Region experienced significant increases in project cost between ROD completion and RD completion? After approval of the RA budget? What factors were responsible -- e.g., project delays, problems with the ROD? How often have cost estimates in the ROD/EDD come within +50% to -30% of actual project costs?

39. After the construction phase, has the final inspection revealed significant problems at any remedial sites in the Region? Have problems become apparent through groundwater monitoring or in preparation of the final technical report? To what extent were changes in site condition involved?

Oversight of State-lead Projects

40. Has the Region completed reviews of state procurement programs and management of cooperative agreements under the Management Assistance Program (MAP)?

41. What issues or problems have been disclosed through MAP reviews performed by the Region?

42. Has the Region conducted follow-up on completed reviews to ensure that States are moving to correct identified problems?

43. Are States consistently achieving PRP settlements or cleanups at State-lead sites? What is their record on:

- Meeting goals of the Interim Settlement Policy;
- Achieving adequate PRP compliance;
- Enabling NPL deletions?

44. How involved are Regional staff in State-lead enforcement actions, including negotiations, certifying and signing settlements, and overseeing PRP response?

45. Are States submitting major deliverables in a timely manner: quarterly reports, draft orders or consent decrees, RI/FS reports, etc.? Do they contain the required information?

46. To what extent have States met the criteria for classifying NPL sites as State-lead enforcement? For sites in this category, does the Region execute a formal agreement with the State (Cooperative Agreements or EPA/State enforcement agreements)?

47. Have States been timely in:

(a) notifiying the Agency of their intention to participate in PRP negotiations (within 30 days of notice)?

(b) submitting comments on the RI/FS, alternative remedies, and waivers from legally applicable State standards (within 60 days of receipt)?

48. Where §106 actions do not conform to State standards, what avenues are the States pursuing; e.g.:

    - concurring with the remedy and becoming a signatory to the consent decree;
    - intervening, before entry of the consent decree, to have remedy conform to State standards;
    - no recourse.

49. What approach has the Region taken to obtain information from States on potentially applicable or relevant and appropriate requirements (ARARs) of State law? Has the State provided timely notification of potential ARARs for each feasibility study planned or in progress?

50. What is the Region doing to inform States of reauthorization changes affecting their role?

RP Oversight

51. How does the Region track RP response for removal actions, RI/FS, RDs, RAs? Discuss the use of project management systems, factors that may delay project completion, and steps taken to return projects to schedule.

52. What review and approval procedures are used for work plans, QAPjPs, health and safety plans, and sampling plans? What interim deliverables are required of RPs?

53. How long does the Region take to review required deliverables?

54. On average, how many sites does a project officer review? To what extent does project officer turnover affect Agency efforts to monitor PRP compliance?

JUDICIAL ENFORCEMENT

1. How are sites selected for a §106 referral for remedial relief or a §106 referral for penalities? How are these referrals used to compel PRP response?

2. How are the Regional Counsel and the Justice Department involved in the decision to pursue litigation? In compliance monitoring?

3. What forms of technical advice are required to support an ongoing case? How is the TES contract vehicle used for case support?

4. How are technical staff involved in determining the adequacy of settlement proposals?

5. What factors have led to delays in case completion and what is being done to expedite the process?

COST RECOVERY

1. What procedures does the Region follow in initiating cost recovery actions? How are sites selected for cost recovery action?

2. Have any problems been observed with cost recovery documentation?

3. How does the Region deal with bankrupt responsible parties?

4. How does the Region move ongoing cost recovery actions to settlement or trial? Focus specifically on the role of technical staff in settlement negotiations and factors that may delay case resolution.

REMOVAL PROGRAM

Removal Implementation

1. How has the Region handled response situations involving close coordination between the removal and remedial programs? Have the RPM and OSC made joint decisions on appropriate handling of such cases? What screening criteria are used to determine whether an ERA should be performed?

2. In what situations has the Region requested exemption from statutory limitations on removal actions? How have such requests been justified?

3. Are removal response decisions fully supported in required documentation (e.g., action memos, OSC reports) to facilitate cost recovery action?

4. Under the revised NCP, the Region has broader authority to respond to threats of release. How has this affected the nature or number of removal actions performed in the Region?

5. Under reauthorization, the Agency is required, to the extent practicable, to ensure that removal actions "contribute to the efficient performance" of long-term remedial actions. How is the Region implementing this provision?

6. To what extent have releases or release threats recurred after completed removal cleanups? What was the cause of the recurrences? Have any removal restarts been related to difficulties with the initial response?

7. To what extent has the use of alternative technologies been considered in developing removal responses? How often, and in what situations, have such approaches been selected?

8. How has the use of alternative technologies been affected by technology limitations, cost considerations, the need for urgent response, or administrative concerns (e.g., lack of incineration capacity)?

9. Has the Region experienced any unreasonable delays in initiating removal action? What steps in the process have been affected?

10. How does the Region determine appropriate cleanup levels and trigger levels for removal actions? What is the role of "applicable or relevant and appropriate requirements" (ARARs) in this determination? To what extent is the basis for setting cleanup levels documented in action memos, OSC reports and POLREPs?

11. Has the Region appointed a contact person to monitor functions related to sample analysis and to work with Regional QA staff?

12. In monitoring non-federal removal actions, how does the Region determine whether the State or local agency is handling the action properly? How often has the Agency taken over removal actions initially performed by a State or local body?

13. How has the Off-Site policy affected removal actions? Have delays resulted from insufficent capacity at permitted or interim status facilities?

14. What forms of training are required of OSCs? At what stage are new OSCs allowed full site responsibilities?

15. How does the Region monitor (federal) removal actions? To what extent are OSCs present on-site? When they cannot be on-site, how is monitoring accomplished?

16. Are there protocols to ensure that important policy and guidance documents are available to OSCs? Does each OSC have a copy of key materials?

17. How does the Region coordinate major actions with HQ? How accurate and timely are Regional data submissions (e.g., SCAP, SPMS)? What personnel are responsible for ensuring that data are transmitted on time?

Removal Contract Management

18. What steps has the Region taken to implement recommendations of the ERCS and TAT reviews conducted in 1984-86?

19. What procedures are followed to verify contractor charges and adherence to project workplans? Are payment vouchers compared with OSC reports? To what extent are OSCs present on site to monitor project design and costs? How often have discrepancies been reported?

20. Within the past year, what proportion of removal actions have stayed within the authorized cost ceiling? How often has the limit been exceeded, and for what reasons?

21. How well have removal timeframes reflected initial schedule projections? In time-critical actions, have ERCS contractors mobilized within required response times?

22. What is the Region's overall assessment of ERCS and TAT performance? What areas need improvement?

ANALYTICAL SUPPORT PROGRAM

1. Has the Region established an integrated system for planning and tracking sample requests and shipments? How is this system related to SMPs? Does the Region have a system for monitoring sample analysis against projected schedules and costs?

2. How do the Region's Waste Management Division and ESD coordinate field sampling activity with RSCC bookings? How does the RSCC establish priorities among different analytic needs?

3. Does the Region's ESD/ESAT perform quality assurance on sampling data according to prescribed procedures and timeframes? Is the validation prioritized by site status?

4. Does the Region's ESD provide timely review of project QAPPs? Does the Region review sampling plans for adequacy before making requests for CLP analysis?

5. How is analytical work allocated among CLP contractors, the ESD, and remedial/removal contractors? How does the Region monitor sample analysis conducted by non-CLP contractors?

6. Does the Region actively participate in the CLP caucus process?

7. How does the Region provide information to the SMO on special methods required for SAS? Is this performed thoroughly and expeditiously?

8. Does the Regional laboratory participate in the CERCLA QA programs by analyzing quarterly performance evaluation samples?

FINANCIAL MANAGEMENT

1. Indicate whether the Region's funds control and financial document processing functions are performed by the program divisions or a central administrative office (e.g., Administrative Services Division).

2(a). If the program divisions have these duties:

- Has the program division staff received adequate training for these functions?

- Are the procedures documented in writing?

- What problems have arisen, and how have they been addressed?

2(b). If an administrative office has these duties:

- Describe any problems in communication or coordination between the program division and the administrative office.

- Indicate any problems in controlling and reporting on the overall allowance, especially if the remedial and removal components are handled by different offices.

3. What systems does the Region use for tracking commitments, obligations and outlays (e.g., firstup, ORMs, PCs, manual DCRs)? What are their advantages and disadvantages? Are the systems adequate to prevent over-obligations and project future funding needs?

4. Does the Region's financial document processing flow reflect the 1984 Remedial and Removal Financial Management guidance? Explain any differences that may exist and any reasons for delay.

COMMUNITY RELATIONS

1. Does the community relations coordinator maintain regular contact with technical and enforcement staff to coordinate their involvement in CR activity? Are members of the technical staff present at key public meetings and discussions with public officials?

2. How does the Region monitor and evaluate CR activities at state-lead sites? Are state quarterly reports reviewed to assess state performance on CR? Are any problems apparent?

3. How could the CR program be modified to achieve its goals more effectively? What CR techniques have worked particularly well? What assistance is needed from Headquarters?

4. How is the Region's CR program perceived by the public?

CHEMICAL EMERGENCY PREPAREDNESS PROGRAM

1. Have all States in the Region completed State Implementation Memos designating CEPP priority areas? If not, what States are missing, and how much work remains? On what basis were priority areas selected?

2. What contingency planning activities (technical assistance or training) does the Region plan to conduct with States? What is their current status? Does the Region evaluate the adequacy of risk analysis performed by the States?

3. Which table-top or field simulations has the Region conducted or participated in? Did the exercises appear successful? Has the Region worked with any States to improve the exercise?

4. How does the Region use contractors (e.g., TAT) in CEPP activities?

TECHNOLOGY TRANSFER

1. How does the Region disseminate technical information among Regional staff, contractors, States and other Regions? What kinds of information are circulated?

2. Has a Technology Transfer Coordinator been designated? What share of his/her workload involves facilitating information exchange on tech transfer?

3. Over the past year, what actions has the Region taken to implement technology transfer initiatives?

4. When questions arise on technology issues, what information sources does the Region most frequently consult? To what extent are inquiries directed to EPA HQ?

INFORMATION COLLECTION AND MANAGEMENT

1. What systems and procedures has the Region developed to manage the collection of activity data and ensure timely entry in SPMS, SCAP, and SMPs?

2. How does the Region verify the accuracy and completeness of activity data obtained from RPMs, OSCs, and other providers?

3. How has the Region used Regional and program-wide data systems (e.g., CERCLIS) to improve program and project management?

4. Has the Region established an administrative record for all Fund-financed and enforcement response actions? What items are included in the record?

MANAGEMENT OF HUMAN RESOURCES

1. What plans are in place to ensure that needed staff are hired and trained? How have these plans been affected by reauthorization, including the specific provisions related to training?

2. How has staff turnover affected the progress of site activity?

3. What is the relationship between the Region's training achievements and identified training needs? How have those needs been assessed?

4. How does the Region evaluate the effectiveness of its training program? What are the results of the evaluation?

5. How are available training FTEs being utilized? Has a position been created for a Regional Training Coordinator?